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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

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In re:

Tanisha I. Green

Debtor

Case No.: 23-17427-ABA

Hearing Date: June 11, 2024

10:00 AM

Chapter: 13

**CERTIFICATION OF TANISHA I. GREEN IN SUPPORT OF  
MOTION TO REIMPOSE THE AUTOMATIC STAY AS TO GOLDCREST  
PROPERTIES/GREENWOOD MAPLE J/JAY MAPLE APARTMENTS.**

I, Tanisha I. Green, am the Debtor in this case, and have personal knowledge of the facts set forth herein, and I am authorized to make this certification. I certify that all statements made by me are true and correct and I am aware that if any statements are willfully false, I am subject to punishment for false swearing.

1. On August 25, 2023, I filed my Chapter 13 Bankruptcy Petition. My plan was set up to pay my rental arrears to save my home of approximately thirteen years. At the time of filing, I was approximately \$5,907.00 in arrears.
2. My Chapter 13 Bankruptcy Confirmation Hearing is rescheduled (related document:[28] Modified Chapter 13 Plan to May 22, 2024.

3. Prior to filing my petition and because of Covid, I experienced a financial hardship that caused me to fall behind on my pre-petition rent payments.
4. Unfortunately, I was unexpectedly affected by Covid for the second time which caused an additional financial hardship which caused me to fall behind in post-petition rent payments.
5. It has been a struggle to keep up after falling behind and missing work due to covid related illness. Throughout these hardships, I have been trying to work things out with my landlord.
6. On February 1, 2024, a Motion for Relief from the Automatic Stay was filed, despite Goldcrest Properties/Greenwood Maple J/Maple Jay Apartments having received New Jersey Department of Community Affairs (NJ DCA) FUNDS.
7. On February 6, 2024, an opposition to creditor's motion for relief was filed with an attached debtor's exhibit including an email referenced as NJE230934. This NJ DCA letter provides the approval of Emergency Rental Assistance in the amount of \$2,325.00. The letter **(Exhibit A)** further states; " I agree not to pursue eviction based on rent amounts reimbursed by these funds and agree to dismiss any pending eviction case that is based on or seeks to recover the reimbursed arrears. "
8. My attorney had relayed to me that a consent order was proposed by Mr. Muhlbaier, Esq. representing the landlord at Goldcrest Properties/Greenwood Maple J/Maple Jay Apartments, in order to resolve Creditors Motion to Vacate Automatic Stay. **Exhibit B**
9. I had agreed to the terms, however, my attorney and I opposed the amount of the creditor's attorney fees in the amount of \$950.00 while believing the creditor's legal fees to be excessive.
10. On May 14, 2024, an Order Granting Landlord Relief from Stay re: 1480 S. Maple Drive, Unit C-2, Vineland, NJ 08360 was recorded (docket no. 41).

11. I have lived in my apartment for approximately 13 years, and it means a lot to me to be able to stay in my home. I understand the payments have been irregular, and in summary, was due to covid, and due to an error by NJ DCA, but I have always been focused on getting the landlord paid.

12. As previously stated in line 7, in November 2023, the landlord had accepted a payment in the amount of \$2,325.00 paid by **NJ-DCA EPP**. The creditors table does reflect this payment (Exhibit B)

13. I also made a payment of \$500.00 in March 2024. The creditors table does reflect this payment (Exhibit B)

14. I am in receipt of the payment award letter from **NJ-DCA EPP (Exhibit D)** which states;

*"This letter confirms that our staff has evaluated and approved assistance for Tanisha Green residing at 1480 S Maple Dr C2, Vineland, New Jersey 08360 under the following program(s):*

***EVICTIION PREVENTION PROGRAM (EPP)***

*The amount Approved for One-Time Arrear Payments are as follows: **\$6,553.**"*

15. Prior to the court hearing on May 14, 2024, I provided a copy of the payment award letter to my landlord via email on May 8, 2024 (see **Exhibit C**), believing that it would resolve the rental arrearages and that it would resolve the court matter that was scheduled.

16. However, unfortunately, I made the mistake of not supplying the same letter to Mr. Wasserstrum prior to the hearing on May 14, 2024.

17. I have been trying my best to make sure that the landlord is paid. For many months, I remained determined to get the rent paid while burdened with the painstaking task of resolving the error NJ DCA made by issuing the rent money to the wrong landlord.

18. At this time, I agree that I owe \$7,253.00 for rental arrears. I agree that I also owe \$ 868.00 for May 2024 rent, a total of \$ 8,121.00.

19. I would like to include pre-petition rental arrears in the amount of \$3,925.00 for months up to August 31, 2024, in my plan.
20. If allowed to include the pre-petition rental arrears of \$3,925.00 in my plan, the amount that I owe the landlord post-petition is \$3,328.00 plus May 2024 rent of \$868.00. Post petition rental arrears through to May 2024 total \$4,196.00.
21. From what I understand, the NJ DCA check in the amount of \$6,553.00 was issued to the landlord on May 9, 2024, which would allow me a credit in the amount of \$2,357.00
22. I am respectfully requesting that the automated stay is reimposed. I am working full-time now and I believe that I am able to pay the rent going forward.
23. Allowing my home to be at risk of eviction would cause me irreparable harm.
24. I respectfully request that the Court intervene and reimpose the Automatic Stay on my home and allow me an opportunity to save my home.

I, Tanisha I. Green, certify all statements made heretofore by me are true and correct to the best of our information, knowledge, and belief; and I am fully aware that if any statement is willfully false, I am subject to punishment for false swearing.

Dated: 5/17/24

/s/ Tanisha Green  
Debtor, Tanisha I. Green